

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|---------------------------------|---|------------------------------|
| In Re: |) | |
| |) | |
| THE WHEATLAND GROUP, LLC |) | Case No. 10-12856 SSM |
| |) | Chapter 11 |
| Debtor. |) | |

**NOTICE OF DEBTOR’S APPLICATION TO
RETAIN COUNSEL AND HEARING THEREON**

PLEASE TAKE NOTICE that the Debtor and Debtor-in-Possession, The Wheatland Group, LLC, has filed an Application for authority to retain Christopher L. Rogan and the RoganLawFirm, PLLC (“RLF”), as counsel. The Debtor seeks to retain RLF to represent it in this Chapter 11 proceeding. The Debtor has agreed to pay RLF a retainer of \$15,000. RLF holds an initial retainer in the amount of \$10,384.38. The retainer balance of \$4,617.62 will be paid by the Debtor post-petition.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not wish the Court to grant the relief sought in the Application, or if you want the Court to consider your views on the motion, then on or before **May 4, 2010**, you or your attorney must:

- File with the Clerk at the following address:

Clerk of Court
United States Bankruptcy Court
200 South Washington Street
Alexandria, Virginia 22314

a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H).

Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the Application as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above. You must **also** mail a copy to the persons listed below.

- Attend the hearing scheduled to be held on **May 11, 2010** at **11:00 a.m.** in Courtroom III, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. **If no timely response has been filed opposing the relief requested, the Court may grant the relief without holding a hearing.**
- A copy of any written response must be mailed to the following persons:
 - Christopher L. Rogan, Esquire
RoganLawFirm, PLLC
30-D Catocin Circle, SE
Leesburg, Virginia 20175
 - United States Trustee, Region 4
115 South Union Street, Suite 210
Alexandria, Virginia 22314

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Application or objection and may enter an order granting the relief.

Date: April 13, 2010

/s/ Christopher L. Rogan
Christopher L. Rogan, Esquire (VSB #30344)
ROGANLAWFIRM, PLLC
30-D Catocin Circle, SE
Leesburg, Virginia 20175
(703) 771-9191/Telephone
(703) 777-9797/Facsimile
Proposed Counsel to Debtor

CERTIFICATE OF SERVICE

I hereby certify that service of a true copy of the foregoing has been made as follows:

| | |
|-----------------------------|-----------------------------------------------------------------------------------|
| Type of Service: | Electronic Mail via the United States Bankruptcy Court and First-Class, U.S. Mail |
| Date of Service: | April 13, 2010 |
| Persons served and address: | See attached Service List |
| Item Served: | Notice of Motion and Hearing on Debtor's Application to Retain Counsel |

/s/ Christopher L. Rogan
Christopher L. Rogan